# Evolutions in Policy, Markets and Measurement of Emissions



Tim Romer and Josh Zier May 2023

#### Pressure to Disclose and Prove Emissions Reductions



UPSTREAM, MIDSTREAM, DOWNSTREAM

# Federal, State and European Policy Evolutions

#### Emissions Measurement Is Key Focus Across Multiple Ongoing US Rulemaking Processes

#### Inflation Reduction Act

- Methane Fee & new "empirical" data emissions reporting requirements and royalty collections for oil/gas operations on federal lands.
- Clean hydrogen tax credit, 45V, which provides \$3/kg in credits for hydrogen manufactured with < 0.45kg lifecycle CO2e emissions per kg of hydrogen produced.

#### EPA Methane Rules

 New rules and enhanced accuracy of emissions data reported to EPA

#### **DOE Best Management Practices Framework**

 Use of direct measurement can be the basis of transparency and transactability



#### SEC Climate Disclosure Rule

 Required to produce consistent, comparable, and reliable GHG emissions disclosures for investors

#### **BLM Waste Prevention Rule**

 Require accurate accounting under new royalty provisions in the Inflation Reduction Act

#### U.S. Methane Emissions Reduction Action Plan - Global Methane Pledge

• Accurate global tracking of methane emissions

## EU Defining Regulations for Natural Gas Imports

Regional Controls and Imports



Rule in Force end-2023; Delegated Acts to Commission finalized 2025



#### State Policy Initiatives

State governments are evaluating options to reduce emissions, encourage certified natural gas utilization, and enable utility cost recovery for acquisition of low emission gas

#### **Agency Activity**

- Colorado multiple regulatory initiatives underway
  - Methane Intensity Verification Rulemaking
  - Best Management Practices
  - NOX/GHG reduction
- Pennsylvania
  - Considering performance-based permitting using air quality metrics
- New York
  - Climate Leadership & Community Protection Act recognizes reductions in Scope 3 emissions

#### Legislative Activity

- Proposed California SB-781
  - Imported low emission natural gas procurement policy under consideration in the Senate
- Tennessee Natural Gas Innovation Act, HB2315
  - Enacted 2022 and authorizes utility cost recovery of innovative natural gas resources
- Virginia Senate Bill 565
  - Enacted 2022 and permits utilities to include supplemental forms of gas in fuel portfolios

# Overview of RSG Market

# What is Responsibly Sourced Gas (RSG) or Certified Gas or Differentiated Gas?

- Certified gas undergoes independent, 3rd-Party assessments or scoring of environmental best practices
- Buyers use Purchasing Power to reduce methane emissions and other environmental impacts of natural gas production
- Low Methane Intensity: certified gas verify methane intensities below 0.20% at each well or basin
- Other Environmental Attributes can be evaluated: Low Water Usage, safety, land, community impacts
- Large Volumes Available: 25%+ of US gas market is certified





#### Demand Side: Utility Buyers

- New York Power Authority (NYPA) 3 x 30-day RFPs in 2022, with premium
- Central Hudson Gas & Electric 6-month pilot May-Oct 2022 for 20% of total volume, with premium
- **Orange & Rockland** PUC approved RSG pilot with cost recovery, \$100k/yr cap for premiums
- **ConEdison** Filed for permission to pilot RSG with cost recovery, \$800k/yr cap for premiums
- NY State Electricity & Gas and Rochester Gas & Elec (Avangrid) Filed for pilots with cost recovery, \$250k/yr cap
- **Xcel Energ**y Early adopter, commitment to 100% RSG by 2030
- Southern Company Gas (NICOR, Virginia Natural Gas) Early adopter, 18BCF since 2019, ~1/3rd of customer demand
- Enbridge Gas Inc. filed annual gas plan including quantification of emissions reductions based on certified gas purchases



## Why Data Matters



Range of Company's Methane Intensity Across Assets

Source: Anonymous E&P company

# Cost Savings From Buying Lower Emissions Gas Relative to Carbon Prices

	Cost per MCF of Credits Given Varying Methane Intensity (\$/mcf)														
		0.01%	1	0.05%	1	0.10%	)	0.15%	)	0.20%	)	0.25%	, )	0.30%	0.35%
\$20	\$	0.00	\$	0.02	\$	0.03	\$	0.05	\$	0.06	\$	0.08	\$	0.09	\$ 0.11
\$30	\$	0.00	\$	0.02	\$	0.05	\$	0.07	\$	0.09	\$	0.11	\$	0.14	\$ 0.16
\$40	\$	0.01	\$	0.03	\$	0.06	\$	0.09	\$	0.12	\$	0.15	\$	0.18	\$ 0.21
\$50	\$	0.01	\$	0.04	\$	0.08	\$	0.11	\$	0.15	\$	0.19	\$	0.23	\$ 0.26
\$60	\$	0.01	\$	0.05	\$	0.09	\$	0.14	\$	0.18	\$	0.23	\$	0.27	\$ 0.32
\$70	\$	0.01	\$	0.05	\$	0.11	\$	0.16	\$	0.21	\$	0.26	\$	0.32	\$ 0.37
\$80	\$	0.01	\$	0.06	\$	0.12	\$	0.18	\$	0.24	\$	0.30	\$	0.36	\$ 0.42
\$90	\$	0.01	\$	0.07	\$	0.14	\$	0.20	\$	0.27	\$	0.34	\$	0.41	\$ 0.47
Annual Cost to Offset for 100,000 mcf/d:		\$365K	\$	1.1M	Ş	52.2M	ç	53.3M	\$	4.5M	\$	5.5M	\$	6.6M	\$ 7.7M

Sources: EPA. Wood and Mackenzie.

1. Stated EDF methane intensity of natural gas of 1.38%. Expresses methane emission per unit of gross gas production; the 0.454% figure includes only production operations

and implicitly attributes all methane emissions from natural gas wells to natural gas production.

2. TrustWell® cutoff for certified gas methane intensity that a best-in-class operator can achieve.

3. The Intergovernmental Panel on Climate Change (IPCC) has indicated a GWP for methane of 82.5 when considering impact over a 20-year timeframe.

Engagement in Certified Gas is Increasing Along the Value Chain

#### Supply Chain - Wellhead to Market

Upstream	Gathering/Processing	Interstate Pipeline	LNG	Utilities
		TALLGRASS		People, Power. Possibilities Central Hudson A FORTIS COMPANY
SWN Chevron		LINEROT	uni	<b>New York Power</b> Authority
Southwestern Energy®			per	New Jersey Natural Gas
			engie	Southern Company
Essential Energy. Responsibly Produced.				<b>⊘ Xcel</b> Energy™
V PENNENERGY Resources				<b>Washington</b> <b>Washington</b> <b>Gas</b> <i>WGL Company</i>

## Recent Developments in the RSG Marketplace

Organizations and buyers alike are establishing RSG standards and several transactions have been recently announced.



# Registries Support Certified Gas Transactions

# Registries Continue Strong Momentum: Accurate. Easy. Auditable.

- Registries create
  digital environmental attributes
- Allows gas buyers & sellers to see granular data and manage emission profiles
- Traders/Originators can incorporate the lowest methane intensity into transactions with their end use customers.







# Evolutions in Monitoring Emissions

## Emissions Monitoring and Quantification: What Have We Learned?

- Monitoring results in reductions: 9 month study involving flyovers and continuous emissions monitors by EEMDL/Cheniere (see footnote)
  - Top down measurements all higher than bottoms up
  - Site level measurements were sometimes higher and sometimes lower than bottoms up
- Quantification is complex! No single model works for every facility
- Need to understand how methane emissions change based on geographic, atmospheric, topographic, and temporal variables and what are the best applications for technologies
- A portfolio of technologies is needed to create a "digital canopy" of air emissions

"Toward multi-scale measurement informed methane inventories: reconciling bottom-up inventories with top-down measurement using continuous monitoring systems"

https://chemrxiv.org/engage/chemrxiv/article-details/63e526b9fcfb27a31f7c0a6c

Energy Emissions Modeling and Data Lab, The University of Texas at Austin and its partners



#### **Emission Monitoring Dashboard**



#### Detect, Resolve and Quantify Leaks

- Alert indicated a methane leak
- Operator analyzed wind and emissions data to source leak to a cooler line and verified using OGI camera
- Quantify the emissions during the leak event



# Common Issues Identified Due to Emissions Alerts

Problem	Event Type	Time from Alert To Fix Source Attribution/Remediation	Solution			
Liquid Knock Out Tank Frozen	Normal Operation	73 hours	Frozen tanks had to have their vapor lines disconnected, leading to emissions.			
Inefficient Flaring	Hardware Inefficiency	42 hours	SCADA data confirmed that a combustor didn't light, flow pressure issues fixed - improving combustion.			
Vapor Recovery Unit Pressure Issues	Hardware Inefficiency	7 hours	Vapor Recovery Unit pressure levels accounted for preventing continued emissions.			
Thief Hatch Left Open	Leak	4 hours	Operations team made aware of event; hatch closed, leak remediated.			
Unplanned Storage Tank Venting	Hardware Inefficiency	40 minutes	A seal was stuck open, leading to pressure buildup in storage tanks leading to venting. Closing the seal fixed the issue.			
Water Hauling Emissions	Process Inefficiency	10 minutes	Oil Field Services company didn't connect to vapor line. OFS companies addressed by HSE Dept.			

# Quantifying Total Site Emissions

- 1 kg/hr X 5 days = 120 kg
  of methane
- Actionable data to set baselines and prove abatement from changes in equipment or processes



Data for illustration purposes only and not representative of emissions from this specific pad

## The Problem: Reconciling Emissions



#### The Goal: Reconciled Reporting Framework (e.g. OGMP 2.0)

Operators will need to reconcile emissions from Subpart W with site-level measurements (and other relevant technologies)



# THANK YOU



#### What We Do

Project Canary (certified B-corp.) is a SaaS-based data analytics company focused on providing accurate emissions management through the energy supply chain and other sectors.

We are the leaders in environmental risk assessments and facilitylevel emissions measurement using advanced monitoring technology.

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Our Investors
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PARTNERS









#### By the Numbers

60+ customers across upstream, midstream, downstream, utilities, landfills, CCS

**10+** bcf/d assessed gas

1,900 devices deployed

10,000+ environmental risk assessments

150+ employees Denver, CO and Hayward, CA



# GET IN TOUCH.

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